

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MARLON POLLARD, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

COMMUNITY HEALTH CARE, INC. d/b/a
COMPLETECARE HEALTH NETWORK,

Defendant.

Case No.: 1:24-cv-00305

NOTICE OF RELATED ACTIONS

Plaintiff gives notice to the Court of the following cases pending in this District related to this one, as they each arise out of the same Data Breach at issue in this case:

- *Lyston v. Community Health Care, Inc.*, Case No. 1:24-cv-00097,
- *J.S. v. CompleteCare Health Network*, Case No. 1:24-cv-00189, and
- *Santiago v. CompleteCare Health Network*, Case No. 1:24-cv-00360

For efficiency purposes and pursuant to Federal Rules of Civil Procedure 42(a) and 23(g), counsel for the Plaintiff in this matter and in the above-referenced matters are contemporaneously filing a Joint, Unopposed Motion to Consolidate Cases and Appoint Interim Class Counsel in the *Lyston* matter, the lowest docketed Related Action of the four.

Counsel for the Plaintiff hereby notifies the Court that it does not oppose the request to transfer this matter into the *Lyston* matter before the Honorable Renée Marie Bumb. Defendant does not oppose consolidation and takes no position on the motion as to leadership.

Dated: February 16, 2024

Respectfully submitted,

LAUKAITIS LAW LLC

/s/ Kevin Laukaitis

Kevin Laukaitis

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Counsel for Plaintiff and the Class

CERTIFICATE OF SERVICE

I certify that on this 16th day of February 2024, a true and correct copy of the foregoing was filed with the Clerk of Court via the Court's CM/ECF system for electronic service on all counsel of record.

/s/ Kevin Laukaitis

Kevin Laukaitis